

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

ANGELA ADKINS, on behalf of  
herself and all others similarly situated,

Plaintiff,

v.

EVEREST GLOBAL SERVICES,  
INC.,

Defendant.

Case No. 3:23-cv-00004-MAS-  
LHG

District Judge Michael A. Shipp  
Magistrate Judge Lois H. Goodman

**STIPULATION TO EXTEND DEFENDANT'S TIME TO AMENDED  
ANSWER COMPLAINT**

Plaintiff Angela Adkins, ("Plaintiff") and Defendant Everest Global Services, Inc. ("Defendant"), by and through their counsel, hereby stipulate and agree to extend the time by which Defendant is required to respond to or answer Plaintiff's Complaint until November 24, 2024.

If Defendant is to file a Rule 12 Motion, the Parties agree to and seek the Court's approval for the following proposed briefing schedule:

- Defendant's Motion to Dismiss: November 25, 2024
- Plaintiff's Opposition to Motion to Dismiss: December 16, 2024; and
- Defendant's Reply: December 24, 2024.

Dated: 10-30-2024 \_\_\_\_\_

\_\_\_\_\_  
/s/Gary M. Klinger

Gary M. Klinger  
**MILBERG COLEMAN BRYSON  
PHILLIPS GROSSMAN, PLLC**  
100 Garden City Plaza, Suite 500 Garden  
City, New York 11530 Tel.  
(847)208-4585  
[gklinger@milberg.com](mailto:gklinger@milberg.com)  
***Attorneys for Plaintiff***

Dated: 10-30-24 \_\_\_\_\_

\_\_\_\_\_  
/s/Steven M. Richman

Steven M. Richman  
Myriah V. Jaworski  
Chirag H. Patel  
**CLARK HILL**  
210 Carnegie Center  
Suite102  
Princeton, NJ 08540  
(609)785-2911  
[srichman@clarkhill.com](mailto:srichman@clarkhill.com)  
[mjaworski@clarkhill.com](mailto:mjaworski@clarkhill.com)  
[cpatel@clarkhill.com](mailto:cpatel@clarkhill.com)  
***Attorneys for Defendant,  
Everest Global Services, Inc***

SO ORDERED

Dated: \_\_\_\_\_

\_\_\_\_\_  
Honorable Judge Michael A. Shipp